

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WISCONSIN

In re Lee David Mork, Jr., )  
 )  
 Debtor. ) Case No. 3-20-12414  
 ) Chapter 13  
 )

## **RESPONSE TO TRUSTEE'S MOTION TO DISMISS**

Lee David Mork, Jr. (“Debtor”) through her counsel, Michael J. Watton, and the Watton Law Group, hereby responds to the Motion to Dismiss filed by the Chapter 13 Trustee.

Debtor lost his job shortly after filing, causing him to fall behind on the plan payments. Debtor has secured new employment and is working with counsel to provide an amended plan and budget forthwith. Debtor will commence making regular payments to the Chapter 13 Trustee.

Wherefore, the Debtor respectfully requests that the Court deny the Trustee's Motion to Dismiss and hold a hearing on the matter.

Date: November 19, 2020

/s/ Michael J. Watton  
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A copy of the foregoing filed electronically  
on November 19, 2020 with:

Clerk  
United States Bankruptcy Court  
120 North Henry Street  
Madison, WI 53701

Copies of the foregoing mailed or sent electronically  
if the party named accepts electronic service  
this November 19, 2020 to:

Mark Harring  
Chapter 13 Trustee  
131 West Wilson Street, Suite 1000  
Madison, WI 53703-3260

Office of the United States Trustee  
780 Regent Street, Suite 304  
Madison, WI 53715

/s/ Jessica Renzaglia, Paralegal  
(Mailed and filed by)

Mork  
Case No. 3-20-12414